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**Pro hac vice*

13 Attorneys for Plaintiffs

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15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

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18 CALIFORNIA COALITION FOR WOMEN
19 PRISONERS et al.,

20 Plaintiffs,

21 v.

22 UNITED STATES OF AMERICA FEDERAL
23 BUREAU OF PRISONS, et. al.,

24 Defendants.

Case No. 4:23-cv-04155-YGR

**DECLARATION OF CARSON D.
ANDERSON IN SUPPORT OF
STIPULATION REGARDING
CASE SCHEDULE**

1 I, Carson Dean Anderson, hereby declare as follows based on my personal knowledge:

2 1. I am an attorney admitted to practice law in the State of California (SBN 317308).

3 I am a Senior Associate at the law firm of Arnold & Porter Kaye Scholer LLP and counsel for
4 Plaintiffs in the above captioned matter. I have personal knowledge of the facts stated in this
5 declaration.

6 2. The parties respectfully submit that good cause exists for the requested schedule
7 changes to help facilitate ongoing settlement negotiations and because Defendants require until
8 November 29, 2024, to substantially complete their document production.

9 3. Previous Time Modifications: The parties have not previously requested an
10 extension of time related to this Court's Order (ECF No. 310). However, there have been previous
11 requests to modify the schedule in this case, including:

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- 13 • A stipulation to extend the briefing schedule on Plaintiffs' motion for a preliminary
14 injunction filed on September 8, 2023. ECF No. 21.
- 15 • A stipulation to extend the briefing schedule on Plaintiffs' motion for a preliminary
16 injunction filed on October 18, 2023. ECF No. 34.
- 17 • A joint motion between Defendants and Intervenors to continue the intervention hearing
18 filed on July 10, 2024. ECF No. 345.

19 4. The parties further have agreed to the changes in the case schedule set forth below:

Event	Current Date	Proposed New Date
INITIAL DISCLOSURES	June 21, 2024	
CASE MANAGEMENT CONFERENCE	September 9, 2024, at 2:00 p.m.	
SUBSTANTIAL COMPLETION OF DOCUMENT PRODUCTION	n/a	November 29, 2024
NON-EXPERT DISCOVERY CUTOFF:	October 31, 2024	December 13, 2024

1	DISCLOSURE OF EXPERT REPORTS:	Opening: November 22, 2024 Rebuttal: December 20, 2024	Opening: January 6, 2025 Rebuttal: January 31, 2025
2	ALL EXPERTS, RETAINED AND NON-RETAINED, MUST PROVIDE WRITTEN REPORTS COMPLIANT WITH FRCP 26(A)(2)(B):		
3	EXPERT DISCOVERY CUTOFF:	January 31, 2025	February 14, 2025
4	DISPOSITIVE MOTIONS/DAUBERT MOTIONS TO BE FILED BY:	February 28, 2025	
5	DISPOSITIVE MOTIONS/DAUBERT MOTIONS TO BE HEARD, IF FILED	Tuesday, April 8, 2025, at 2:00 p.m.	
6	COMPLIANCE DEADLINE	Friday, May 30, 2025, at 9:01 a.m.	
7	JOINT PRETRIAL CONFERENCE STATEMENT:	May 23, 2025	
8	PRETRIAL CONFERENCE:	Friday, June 6, 2025, at 9:30 a.m.	
9	TRIAL DATE:	Monday, June 23, 2025, at 8:00 a.m. for Jury Trial	

20 5. This request for changes in the case schedule will not affect any other deadlines in
21 the case schedule except those specifically addressed in the stipulation.

22 I declare under the penalty of perjury under the laws of the United States of America
23 that the foregoing is true and correct.

24 Executed October 22, 2024, in Palo Alto, California.

1 DATED: October 22, 2024

Respectfully submitted,

2 ARNOLD & PORTER KAYE SCHOLER LLP

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4 By: /s/ Carson D. Anderson
5 Carson D. Anderson

6 Attorney for Plaintiffs

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